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***Attorneys for Defendants Thomson SA and
 Thomson Consumer Electronics, Inc.***

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION,

No. 07-cv-5944-SC
 MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v.
 Technicolor SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit
 City Stores, Inc. Liquidating Trust v.
 Technicolor SA, et al., No. 13-cv-05261;*

*Best Buy Co., Inc., et al. v. Technicolor SA,
 et al., No. 13-cv-05264;*

*Interbond Corporation of America v.
 Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,
 No. 13-cv-05726;*

*Costco Wholesale Corporation v.
 Technicolor SA, et al., No. 13-cv-05723;*

*P.C. Richard & Son Long Island
 Corporation, et al. v. Technicolor SA, et al.,*

**DECLARATION OF STEPHEN M.
 JUDGE IN SUPPORT OF THOMSON
 DEFENDANTS' OBJECTIONS TO
 SPECIAL MASTER'S JULY 22, 2015
 RECOMMENDED ORDER**

Judge: Hon. Samuel Conti

1 *No. 31:cv-05725;*

2 *Schultze Agency Services, LLC, o/b/o*
 3 *Tweeter Opco, LLC, et al. v. Technicolor SA,*
Ltd., et al., No. 13-cv-05668;

4 *Sears, Roebuck and Co. and Kmart Corp. v.*
 5 *Technicolor SA, No. 3:13-cv-05262;*

6 *Target Corp. v. Technicolor SA, et al., No.*
 7 *13-cv-05686;*

8 *Tech Data Corp., et al. v. Hitachi, Ltd., et*
al., No. 13-cv-00157;

9 *Sharp Electronics Corp., et al. v. Hitachi,*
 10 *Ltd., et. al., No. 13-cv-01173;*

11 *ViewSonic Corporation v. Chunghwa Corp.,*
 12 *et al., No. 14-cv-02510.*

13 I, Stephen M. Judge, hereby declare as follows:

14 1. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel for
 15 Defendants Thomson SA and Thomson Consumer Electronics, Inc. (together “Thomson”). I am
 16 admitted to practice *pro hac vice* before the United States District Court for the Northern District
 17 of California. The statements contained in this declaration are based on my personal knowledge
 18 and, if called as a witness, I could competently testify to the following facts.

19 2. Between Thomson’s former counsel Sullivan & Cromwell LLP (“Sullivan”) and its
 20 current counsel Faegre Baker Daniels LLP (“Faegre”), privileged memoranda exist for interviews
 21 of 16 former and current employees.

22 3. Since discovery against Thomson in these actions began, Thomson has produced to the
 23 Plaintiffs over 283,000 bates labeled pages of documents. Because many of these documents were
 24 produced in native format with a single bates number and many of these native files are twenty
 25 pages or longer, Thomson has likely produced over 1 million pages of documents.

26 4. Direct Action Plaintiffs (“DAPs”) have deposed the following current or former
 27 employees of Thomson Consumer or Thomson SA: (1) Mr. Jack Brunk; (2) Mr. Tom Carson;
 28 (3) Mr. J.P. Hanrahan; (4) Mr. Alex Hepburn; (5) Mr. Jack Hirschler; (6) Ms. Jackie Taylor-

1 Boggs; (7) Mr. Emeric Charamel; (8) Mr. Didier Trutt; (9) Mr. Christian Lissorgues; and (10) Ms.
2 Agnes Martin.

3 5. DAPs have deposed a supermajority of the individuals interviewed by Sullivan or Faegre.
4 With respect to individuals interviewed by Sullivan or Faegre who have not been deposed in this
5 action, based on word searches performed across all discovery responses, documents produced by
6 Thomson, and all depositions taken by DAPs:

- 7 a. The name of each individual appears in at least one interrogatory response;
- 8 b. The name of each individual appears in at least 1,800 documents and in one case
9 more than 10,000 documents; and
- 10 c. The name of each individual except one has been mentioned by an attorney or
11 witness in at least two depositions.

12 6. DAPs followed the Hague Convention process to seek depositions of four former
13 Thomson SA employees in France. Those depositions occurred in March, after DAPs filed their
14 Motion.

15 7. Attached hereto as **Exhibit 1**, are true and correct copies of the Direct Action Plaintiffs'
16 Motion to Compel 30(b)(6) Testimony of Thomson SA and Thomson Consumer Electronics, Inc.,
17 and Exhibits A–E thereto, which were submitted to the Special Master on January 20, 2015.

18 8. Attached hereto as **Exhibit 2**, are true and correct copies of the Thomson Defendants'
19 Opposition to Direct Action Plaintiffs' Motion to Compel 30(b)(6) Testimony of Thomson SA
20 and Thomson Consumer Electronics, Inc., and Exhibits 1–3 thereto, which were submitted to the
21 Special Master on January 27, 2015.

22 9. Attached hereto as **Exhibit 3**, is a true and correct copy of the Reply in Support of Direct
23 Action Plaintiffs' Motion to Compel 30(b)(6) Testimony of Thomson SA and Thomson
24 Consumer Electronics, Inc., which was submitted to the Special Master on February 2, 2015.

25 10. With their Reply, DAPs' also submitted and "Exhibit F," consisting of the Declaration of
26 David M. Peterson Pursuant to Fed. R. Civ. P. 56(d) in Support of Plaintiffs' Opposition to
27 Thomson Consumer's Motion for Partial Summary Judgment and Exhibits thereto, which was
28 previously filed under seal. To avoid an unnecessary additional sealing motion, Thomson

1 respectfully directs the Court to Docket No. 3236-6 for an unredacted version of Exhibit F to
2 DAPs' Reply.

3 Executed this 31th day of July 2015, at South Bend, Indiana.

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5 /s/ Stephen M. Judge
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